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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 STEPHEN GAVIN FRANCOIS,)

14 Plaintiff,)

15 vs.)

16 KILILO KIJAKAZI,
Acting Commissioner of Social Security,)

17 Defendant.)
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Case No.: 2:22-cv-02006-BNW

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE CERTIFIED
ADMINISTRATIVE RECORD AND ANSWER**

(FIRST REQUEST)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
2 and through her undersigned attorneys, hereby moves for a 30-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by January 30, 2023. This is Defendant’s first request for an extension of
5 time. Defendant requests this extension because Defendant has been notified that the CAR is not yet
6 available in this case. Defendant therefore cannot respond to Plaintiff’s Complaint. Once the CAR
7 arrives, Defendant will need to review it for defects before submitting it.

8 For these reasons, Defendant requests an extension in which to respond to the Complaint until
9 March 1, 2023. If Defendant is unable to produce the CAR record necessary to file an Answer in
10 accordance with this Order, Defendant shall request an additional extension prior to the due date.

11 On January 25, 2023, the undersigned conferred with Plaintiff’s counsel, who has no opposition to
12 the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
14 and answer to Plaintiff’s Complaint, through and including March 1, 2023.

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1 Dated: Jan. 25, 2023

2 BLAINE T. WELSH
3 United States Attorney

4 /s/ Edmund Darcher
5 EDMUND DARCHER
6 Special Assistant United States Attorney

7 IT IS SO ORDERED:

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9 UNITED STATES MAGISTRATE JUDGE

10 DATED: January 26, 2023
11 _____

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 701 Fifth Avenue, Suite 2900 M/S 221A, Seattle, WA 98104-7075. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc V. Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Jan. 25, 2023

/s/ Edmund Darcher
Edmund Darcher
Special Assistant United States Attorney